

STARTRACK
Environmental Performance Report
for
Second Year Participants

by

Spalding Sports Worldwide
425 Meadow St.
Chicopee MA 01013

Written By:
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SPALDING SPORTS WORLDWIDE
STARTRACK
ENVIRONMENTAL PERFORMANCE REPORT
8/30/99

BACKGROUND

The following report summarizes and updates the environmental compliance status and environmental performance of Spalding Sports Worldwide's operations at its Chicopee, MA location, as a second-year participant in the EPA's StarTrack program. The format of the report follows the outline provided in the EPA's Environmental Performance Report (EPR) Guidelines, issued May, 1999. Its purpose is to present a profile of Spalding's operations and environmental performance relative to the StarTrack program and its initiatives. It specifically reviews those operations that can impact its environmental performance, while serving as a tool for external communications to interested stakeholders.

PURPOSE

The StarTrack program seeks to expand the use of environmental compliance and management systems audits to improve environmental quality, public understanding of a company's environmental performance and deployment of taxpayer resources. As a StarTrack participant, Spalding has agreed to develop and implement an environmental management system, perform environmental compliance and management audits, implement appropriate corrective actions as needed from the audit findings, with follow-up, and to have these programs certified by an independent third party every three years. These items have all been completed and were previously submitted to the EPA as required. Spalding also agreed to prepare an environmental performance report documenting its progress in improving its overall environmental program, which is attached with this letter.

Compliance information addresses operational conformance with applicable federal, state and local environmental regulations. The environmental performance review requires tabulating and presenting the information identified in the StarTrack EPR Guidelines, including environmental auditing information, as well as the work performed to-date in developing the company's environmental management system (EMS). Spalding has not presented the data in this report in a normalized form, due to confidentiality of trade secret issues, previously approved through the MA Department of Environmental Protection. The data presented

reflects the company's efforts relative to pollution prevention and other associated activities, as incorporated into Spalding's operations, aimed at minimizing possible negative effects on the environment, while highlighting those mechanisms which enhance the company's environmental performance.

It should be noted that this report summarizes data on Spalding's operations specific to the EPR Guidelines as a second-year participant in the StarTrack program. Spalding's first year performance measures involved performing the initial environmental compliance audit and submitting a plan to develop an EMS that mirrored the requirements of an ISO 14001 program. Each of these items were performed and certified by an approved third party professional in the environmental field.

Spalding has since developed procedures and policies for its EMS that meet the requirements of StarTrack and conform to the ISO 14001 EMS Standard. The last quarter of this year (1999) will be utilized to finalize the EMS objectives and targets generated from its environmental aspects/impacts analysis performed earlier this year, and to provide EMS training to key managers, supervisors, and staff (all of whom will be essential to future internal EMS audits). As such, the areas of this report dealing with measured improvements (direct or indirect) from its EMS have yet to fully occur. However, trends in Spalding's environmental performance, both in terms of compliance and program enhancement, have been measured and presented in this report, as well as expected challenges going forward in the pursuit of continuous improvement.

1. FACILITY PROFILE

0.1 Name of Company; name and location of facility:

Spalding Sports Worldwide
425 Meadow Street
Chicopee, MA 01013

0.2 Contact Person:

William Sweetman
Manager, Environmental Engineering
Tel: 413-322-2637
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0.3 Major products/services of facility:

Miscellaneous sporting goods manufacturing
SIC Code: 3949

0.4 Facility Information:

Number of Employees:

950

Indicator(s) of production scale for use in normalizing (e.g., product mass/amount/quantity)

Units of measure = dozen golfballs

0.5 Reporting period for information provided:

Calendar Year(s) 1996-1999 (year-to-date)

0.6 Date of most recent previous report:

7/11/97 – StarTrack Environmental Performance Report – Year 1

0.7 Significant changes in facility size, products/services, that have occurred in the reporting period.

Major consolidation issues, coupled with curtailed production needs, have had the following impacts on Spalding's Chicopee, MA facility within the past year:

- Centralizing all U.S. warehousing from Reno, NV to Chicopee
- Moving commercial grade golf club operations from Gloversville, N.Y. to Chicopee
- Moving off-site inflate and pack operation from West Springfield, MA to Chicopee
- Moving golf glove embroidery operation from Richmond, ME to Chicopee
- Moving corporate headquarters from Tampa, FL to Chicopee
- Downsizing of workforce by 20% due to internal restructuring and early retirement package

2 POLICIES, ORGANZATION & MANAGEMENT SYSTEMS

- 6.1 The Spalding environmental policy commits the company to corporate responsibility, regulatory compliance, pollution prevention and the continual improvement of its environmental management system. Fifteen core EMS procedures are in place to achieve the objectives of this policy. These procedures articulate the “Plan, Do, Check, Act” system at Spalding, and are designed to conform to the procedural elements prescribed in ISO 14001 – Environmental Management Systems Standard.
- 6.2 While the overall responsibility for the EMS rests ultimately with Plant Management, the Environmental Engineering department is responsible for designing, implementing and maintaining an effective EMS. The Spalding EMS Manual has a section that describes the roles, responsibilities and authorities of departments, and certain employees, in implementing and maintaining the Spalding EMS. Additionally, each of the core EMS procedures defines departmental responsibilities in meeting the procedural requirements.
- 6.3 The EMS includes policies and procedures tailored to the unique circumstances at Spalding. These procedures address environmental planning, environmental review of new products, processes or materials, environmental compliance requirements, emergency preparedness and response, internal and external communications and reporting, document and records control, monitoring and measuring environmental performance, training and information, internal EMS audit, preventive and corrective action and management review. Some environmental management topics, such as supplier/vendor management, employee environmental awareness and environmental risk assessment, are addressed within the context of the above-mentioned procedures.
- 6.4 At this time, Spalding Sports Worldwide is not certified to ISO 14001.

3. COMMUNITY RELATIONS

- 2.1 It is Spalding's policy to always consider the potential impact of any new project or process prior to its implementation. In addition to the normal permits and paperwork issues, Spalding will always evaluate any new proposal and determine whether it will affect/impact the surrounding local community. All potential negative impacts are addressed in order to minimize any adverse impacts on the community (trucking, traffic, etc.) where possible.
- 2.2 Spalding is directly tied into the local emergency response personnel throughout the City of Chicopee. Spalding representatives have served as Chairman of its Local Emergency Planning Commission (LEPC) for the first 5 years of its inception, and now participates as an active member of the group. The local agencies' (police, fire, civil defense, public health, etc.) emergency responders are invited to tour the facility and its grounds and participate in company-sponsored drills as often as necessary to familiarize themselves with Spalding's operations.

In addition, Spalding has provided and continues to update a listing of chemicals, processes, and plant layout maps to assist them in responding to an emergency situation at Spalding. It practices plant-wide emergency evacuation drills, which include both its employees and emergency responders, to better prepare for an emergency should one arise.

- 2.3 The City of Chicopee has no organized group of citizens located geographically near Spalding's facility. Spalding has, however, worked with the City and other local businesses in determining what roadways, traffic patterns, and facilities could be set up as emergency shelters should a plant-wide emergency or evacuation be required. Spalding has sponsored for nine (9) consecutive years a Household Hazardous Waste Collection Day for its employees on Earth Day, which serves as both a benefit and educational tool for Spalding's employees to properly dispose of hazardous materials.

4. MANAGEMENT PERFORMANCE

3.1 Spalding performed its annual StarTrack Environmental Compliance Audit of its operations in Chicopee, MA on 8/18/99. The results of the audit indicated:

- There were no records or observations of any violations resulting in serious actual harm to public health or the environment, including violations resulting in significant economic benefit, imminent and substantial endangerment to health and the environment, criminal violations, and violations of administrative or consent orders.
- There were no records or observations of any formal enforcement actions taken against Spalding. No notice of Violations (NOV's) and Notices of Non-Compliance (NON's) issued by states, administrative orders, etc.
- One observation made during the audit found the sign identifying Spalding's Hazardous Waste Storage Area was missing on the outside doorway of the room. The appropriate sign was reinstalled that same day. Other than the sign, there were no other records or observations of any other regulatory program implementation violations such as deficiencies regarding instrument calibration, sampling protocols, container management, etc.
- Spalding had received a deficiency report from the City of Chicopee Water Pollution Control department in April, 1998, regarding the manner in which its semi-annual self-monitoring reports sampling and documentation were performed and submitted.

7.1 Spalding is still in the process of finalizing its formal environmental management system (EMS). The policies and procedures of Spalding's EMS now meet the requirements of StarTrack and conform to the ISO 14001 EMS Standard. This fall, Spalding will finalize its EMS objectives and targets and provide EMS training to key managers, supervisors and staff.

3.3 Corrective actions for issues identified above include:

- a. The Hazardous Waste Storage Area sign – sign that was missing was replaced that same day.
- b. CWPC Deficiency Report – Spalding had hired a new outside lab (Spectrum Analytical) that year to perform the sampling and analysis of its sewer effluent, as well as providing the written report submitted to the CWPC on the results. Spalding had contacted the lab and determined what corrections/changes were needed to meet the requirements of the City of Chicopee. A meeting was subsequently arranged with all parties involved, at which the requirements were reviewed so they could be understood

and implemented on a permanent basis. Those items noted were corrected by the lab, the effluent tested again if needed, and the data resubmitted to the City CWPC.

It should be noted that all of Spalding's effluent parameters sampled were found to be in compliance and within the limits established in its waste water discharge permit.

- 2.1 In August of 1997, an unauthorized release was detected during site construction activities at Spalding's Chicopee, MA facility. Contaminated soil was discovered during the installation of a storm water pipeline associated with an on-going project at the site. The soil contained various volatile organic compounds at concentrations above applicable RCS-2 Reportable Concentrations identified in the Massachusetts Contingency Plan.

Spalding notified the Department of Environmental Protection of the release (#RTN 1-11989). As part of its clean up action, Spalding cordoned off the area, excavated the contaminated soil, and subsequently disposed of the materials at an authorized facility capable of handling the material, while meeting all the other legal requirements identified in the MADEP Massachusetts Contingency Plan regulations. The soil was screened in the field and separated into piles as to whether or not it was a hazardous waste .

Volumes generated/disposed of:

Hazardous Waste – 127.03 tons

Non-hazardous waste – 79.93 tons

- 2.2 Spalding currently has an on-site Soil Vapor Extraction Remediation System in place and in operation at its Chicopee, MA location. The unit is designed to draw solvent vapors under a vacuum from the groundwater and soil located in the north section of its property. The solvent vapors are pumped through two catalytic oxidation units which destroy the solvents. The unit is required to achieve a 95% destruction efficiency, but normally operates in the 97-98% efficiency range.

A Class C Response Action Outcome (RAO) Statement was filed in December, 1998, as required, with the Western MA DEP. The RAO specified the installation and use of the SVE remediation system as part of its Phase IV requirements under the MCP. Total cost for the installation and purchase of the equipment equaled \$292,000.00. The system has removed over 50,000 lbs. of solvent to date. The system is expected to continue to operate for another 2-3 years, until the site can meet appropriate cleanup standards.

5. OPERATIONAL PERFORMANCE

<u>A. INPUTS</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u> <u>(thru 7/99)</u>
<u>4.1 Electrical Usage</u>				
KWH	36,484,800	36,172,800	36,177,600	22,171,200
BTU	10,692.7	10,601.2	10,602.6	6,497.8
5.2 <u>Fuel Oil</u> (mmBTU)	98,780	73,570	90,680	78,679.4
<u>Natural Gas</u> (mmBTU)	156.2	194.9	148.0	93.9
<u>4.2 Total Energy Use</u>				
BTU	109,629	84,366	101,431	85,271
5.4 <u>Water Use</u> (mmGAL)	24.9	39.8	36.7	15.1

B. OUTPUTS

4.5 Emissions (tons)

VOC	61	57	38	21
SO	54	40	50	42
Nox	19	14	20	15.1
CO	1	1.27	1.57	1.36
PM10	4.5	3.33	4.09	3.55

4.6 Spalding has not received any off-site noise or odor complaints.

4.7 All of Spalding's emissions have been identified in Section 5.5.

4.8 Spalding eliminated the use of ozone depleting substances in its production processes on May 15, 1993.

4.9 Chemical Release Data (pounds)

<u>Form R</u>	<u>1996</u>	<u>Operating Year</u>		<u>1999</u>
		<u>1997</u>	<u>1998</u>	
<u>Zinc Compounds</u>				
Qty Released	23,112	51,410	46,178	TBD
Qty Recycled on-site	117,486	51,574	107,181	TBD
Qty Treated off-site	78	51	51	TBD
<u>N-Methyl-2-Pyrrolidone</u>				
Qty Released	9,040	16,480	11,099	TBD
Qty Used for Energy recovery off-site	4,785	0	0	TBD
<u>Methyl Isobutyl Ketone</u>				
Qty Released	31,134	37,214	25,697	TBD
Qty Used for Energy recovery off-site	3,026	0	0	TBD
<u>Diisocyanates</u>				
Qty Released	1	0	0	TBD
Qty Treated on-site	2,600	0	0	TBD
<u>Methyl Ethyl Ketone</u>				
Qty Released	2,002	3,297	0	TBD
Qty Used for Energy recovery off-site	6,253	0	0	TBD
Qty Recycled on-site	5,988	7,231	0	TBD

<u>Form S</u>	<u>1996</u>	<u>Operating Year</u>		<u>1999</u>
		<u>1997</u>	<u>1998</u>	
<u>Zinc Compounds</u>				
Processed	7,994,201	6,942,174	5,837,790	TBD
Generated as by-product	140,598	80,364	35,978	TBD
Shipped in or as by-product	7,853,603	6,861,810	5,801,812	TBD
<u>N-Methyl-2-Pyrrolidone</u>				
Otherwise Used	13,826	14,568	11,099	TBD
Generated as by-product	13,826	14,568	11,099	TBD
<u>Methyl Isobutyl Ketone</u>				
Otherwise Used	34,160	37,214	25,697	TBD
Generated as by-product	34,160	37,214	25,697	TBD
<u>Diisocyanates</u>				
Otherwise Used	157,326	0	0	0
Generated as by-product	2,600	0	0	0

5.10 The primary focus on emissions from the chemicals utilized by Spalding include the following two (2) compounds:

- a. Spalding has historically had an issue with the zinc concentrations measured in its sewer effluent. The process that discharged the zinc has been removed from the sewer, with the addition of an integral water filtration system, which removes the zinc-based solids from the water. The solids are subsequently landfilled as a non-regulated waste and the water is reused in the process. However, there is still residual zinc in the sewer lines that Spalding has tried to clean out. Spalding's sewer effluent limit is 3.36 mg/l. Spalding has not had a Notice of Violation for this material since 1994, but it is still a chemical which Spalding uses and monitors very closely.
- b. Volatile organic compounds (VOC) emissions from its golfball painting department, which includes an emphasis on the use of Hazardous Air Pollutants (HAP's), as defined by the

Clean Air Act, are measure and monitored on a daily basis. Spalding has strict operating requirements through several permits.

5.11 Hazardous Waste (gal. unless specified)	1996	1997	1998	1999 (as of 7/99)
Incinerated	10,285	10,505	12,243	TBD
Recycled				
On-site	3,572	4,870	4,182	1,585
Off-site	9,227	11,758	5,792	3,335
Landfilled	-----	127.05 tons (soil only)	-----	-----

4.12 Non-Hazardous Waste (tons)

Disposal Wastewater	29,766	21,293	8,850	6,000
Recycled	549.42	462.35	593.32	-----
Landfilled	1,109.57	1,238.28	1,081.5	686.07

4.13 Water Discharges (mg/L)

- Parameters measured twice a year
- Values presented are averages for each sampling round
- Only one sampling round performed to date for 1999

	Limit	1996	1997	1998	1999
Oil/Grease	150	<4.0/6.0	<4.0/<4.0	<5.0/<5.0	<5.0
Priority Metals	Varies	<0.1/<0.1	<0.1/<0.1	<0.1/<0.1	<0.1
BOD	N/A	52/45	33/10	21/12	<2
T.S.S.	N/A	17/35	11.8/9.8	18/33	41
pH	5.5-9.5	8.7/7.6	8.2/8.3	7.7/8.0	8.8
Zinc	3.36	0.44/0.54	0.35/0.13	0.1/0.3	0.4

6. PRODUCT PERFORMANCE

- 6.1 The largest environmental impacts associated with the life cycle of Spalding's finished goods include the packaging utilized and the transportation of the finished product, utilizing commercial fleets.
- 6.2 Spalding currently requires its vendors to supply it packaging that is partially made/constructed from recycled products. In addition, the packaging, once used, is available for recycling by its customers.